

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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BARBARA KEILER, MONA GAY THOMAS,  
and LINDA BARRETT, on behalf of  
themselves and all others similarly situated,

Plaintiffs,

v.

HARLEQUIN ENTERPRISES LIMITED, a  
Canadian corporation; HARLEQUIN BOOKS  
S.A., a Swiss company; and HARLEQUIN  
ENTERPRISES B.V., a Dutch company,

Defendants.  
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12 Civ. 5558(WHP)

**NOTICE OF PLAINTIFFS'  
MOTION FOR FINAL APPROVAL  
OF CLASS ACTION SETTLEMENT**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law, the Affidavit of Jose C. Fraga and exhibit thereto, and all prior pleadings and proceedings in this case, the undersigned Counsel for Plaintiffs will move, before the Honorable William H. Pauley III, United States District Judge for the Southern District of New York, at 11:00 a.m., on June 30 2016, at the United States Courthouse, 500 Pearl Street, New York, New York 10007-1312, in Courtroom 20B, or at an alternate date, time, and location to be set by the Court, for an Order granting Final Approval of the Class Action Settlement, approving the Plan of Distribution, certifying the amended Class, granting Class Counsel's previously filed Application for an Award of Attorneys' Fees, Service Awards, and Reimbursement of Expenses, and entering Final Judgment as reflected in the proposed Final Approval Order.

Respectfully submitted,

Dated: June 16, 2016

/s/ Michael J. Boni

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Michael J. Boni (*Pro Hac Vice*)

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